



**Department of Energy**  
**National Nuclear Security Administration**  
**Sandia Field Office**  
**P.O. Box 5400**  
**Albuquerque, NM 87185**



APR 13 2020

Ms. Janice Witul  
USEPA REGION 9  
75 Hawthorne Street  
Mail Code ENF-3-2  
San Francisco, California 94105

Subject: COVID-19 Shelter in Place Order Impacts on Sandia National Laboratories, California

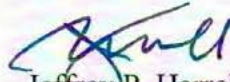
Dear Ms. Witul:

It is the intention of Sandia National Laboratories, California (SNL/CA) personnel to operate the facility in accordance with the requirements of 40 CFR 112, *Oil Pollution Prevention*, and California Health and Safety Code, Division 20, Chapter 6.67, *Above Ground Petroleum Storage Act*. Due to the Shelter In Place Order issued by the Alameda County Public Health Department on March 16, 2020, SNL/CA operations were required to cease routine business operations and reduce to minimum safe operations; thereby reducing the number of employees working onsite to the minimal level required to maintain a safe and secure environment.

This change in business operations has resulted in SNL/CA personnel being unable to complete all of the monthly tank and oil-filled equipment inspections required by SNL/CA's *Spill Prevention, Control, and Countermeasure (SPCC) Plan*. Upon the return of normal business operations, SNL/CA personnel will complete these inspections in a timely manner.

If you have questions, please contact (b) (6) SNL/CA, at (b) (6) or David Rast of our staff at (505) 845-5349.

Sincerely,

  
Jeffrey P. Harrell  
Manager

cc: See Page 2



cc:

(b) (6) SNL/NM

(b) (6) SNL/CA

(b) (6) SNL/CA

(b) (6) MS SNL/CA

(b) (6) SNL/CA

Andrew McIlroy, SNL/CA

(b) (6) SNL/NM

(b) (6) MS SNL/NM

Cynthia Wimberly, SFO/Legal

William Wechsler, SFO/ENG

Susan Lacy, SFO/ENG

David Rast, SFO/ENG

NNSA-2020-001678

## Morimoto, Kaoru

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**From:** Morimoto, Kaoru  
**Sent:** Monday, March 23, 2020 3:53 PM  
**To:** scott.wade@nnsa.doe.gov  
**Cc:** Miller, Amy; Trombadore, Claire; Freed, Rachel; Machol, Ben  
**Subject:** RE: Nevada Field Office: EPA Inspection Response Delay Request

Scott,

Thank you for your response. Your request for an extension for response to Friday, June 12, 2020 is granted.

Regarding the meeting you've requested to make sure you have a full understanding of the issues/observations, I spoke with Ryder and she'll make sure the right people from EPA are available. Who should she coordinate with on your side?

Thanks,  
Kaoru

Kaoru Morimoto, Manager  
Hazardous Waste and Chemical Section (ENF-2-2) Enforcement and Compliance Assurance Division U.S. Environmental Protection Agency, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105  
(415) 972-3306

-----Original Message-----

From: Miller, Amy <Miller.Amy@epa.gov>  
Sent: Thursday, March 19, 2020 4:16 PM  
To: Morimoto, Kaoru <Morimoto.Kaoru@epa.gov>; Trombadore, Claire <Trombadore.Claire@epa.gov>  
Subject: FW: Nevada Field Office: EPA Inspection Response Delay Request

Amy C. Miller  
Director, Enforcement & Compliance Assurance Division U.S. Environmental Protection Agency, Region IX  
(415) 947-4198  
miller.amy@epa.gov

-----Original Message-----

From: Wade, Scott <scott.wade@nnsa.doe.gov>  
Sent: Thursday, March 19, 2020 3:50 PM  
To: Miller, Amy <Miller.Amy@epa.gov>  
Cc: Freed, Rachel <freed.rachel@epa.gov>; Mosser, Jennifer <Mosser.Jennifer@epa.gov>; Chew, Andrew <Chew.Andrew@epa.gov>; Povetko, Oleg <Povetko.Oleg@epa.gov>; Bowman, David <david.bowman@nnsa.doe.gov>; Tomlinson, Laura M. <laura.tomlinson@nnsa.doe.gov>; Huck, Betty <betty.huck@nnsa.doe.gov>; Gladden, Kathryn <kathryn.gladden@nnsa.doe.gov>; Gibson, Coleen C. <coleen.gibson@nnsa.doe.gov>; Alderson, Stacey (CONTR) <alderssl@nv.doe.gov>; Warren, Ronald (CONTR) <warrenrw@nv.doe.gov>; Clifton, Brian <brian.clifton@nnsa.doe.gov>; Redding, Theodore (CONTR) <reddintj@nv.doe.gov>; Christine Andres <candres@ndep.nv.gov>; jkinder@ndep.nv.gov  
Subject: Nevada Field Office: EPA Inspection Response Delay Request

Ms. Miller,

Attached please find our letter from David R. Bowman, Acting Manager for the NNSA Nevada Field Office. If you have any questions, please feel free to contact either Dr. Bowman at 702-295-3211, Ms. Betty Huck at 702-295-4825, or myself.

Scott Wade  
NNSA Nevada Field Office  
702-295-4111



**Department of Energy**  
National Nuclear Security Administration  
Nevada Field Office  
P.O. Box 98518  
Las Vegas, NV 89193-8518



Amy C. Mill  
Enforcement and Compliance  
Assurance Division Director  
U.S. Environmental Protection  
Agency, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**NATIONAL NUCLEAR SECURITY ADMINISTRATION NEVADA FIELD OFFICE  
(NNSA/NFO) RESPONSE - U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)  
TITLE 40 CODE OF FEDERAL REGULATIONS, PART 61, SUBPART H, INSPECTION,  
AUGUST 2017**

On February 12, 2020, NNSA/NFO received USEPA's report that documents the findings and recommendations resulting from their August 2017 Clean Air Act inspection conducted at the Nevada National Security Site (NNSS). In the letter, the USEPA requested that the U.S. Department of Energy submit a draft plan within 60 days of receipt of the report. To assure that we have a full understanding of the issues and observations from the report, NNSA/NFO requests a meeting with appropriate technical and management personnel from EPA Region IX. Through this proposed meeting we intend to develop a common understanding of the USEPA's observations and concerns from the report.

In light of the current situation from the COVID-19 virus, NNSA/NFO requests a 60-day extension allowed for conducting the meeting with EPA Region IX and responding to the USEPA report. As such, the revised due date for response is proposed as June 12, 2020.

If you have questions including coordinating the proposed meeting, please contact Betty L. Huck at (702) 295-4825 or [Betty.Huck@nnsa.doe.gov](mailto:Betty.Huck@nnsa.doe.gov), or Scott A. Wade at (702) 295-4111 or [Scott.Wade@nnsa.doe.gov](mailto:Scott.Wade@nnsa.doe.gov).

David R. Bowman

Digitally signed by David R.  
Bowman  
Date: 2020.03.19 08:01:17 -07'00'

David R. Bowman, Ph.D.  
Acting Manager

Amy C. Mill

-2-

cc:

A. Chew, USEPA

R. Freed, USEAP

J. Mosser, USEPA

O. Povetko, USEPA

S. Alderson, MSTs

T. Redding, MSTs

R. Warren, MSTs

C. Andres, NDEP

J. Kinder, NDEP

B. Clifton, NFO

K. Gladden, NFO

B. Huck, NFO

S. Wade, NFO

MSTs Correspondence Management

AMOS:KLG-20034

ADM 16.1.5.A

## Morimoto, Kaoru

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**From:** Morimoto, Kaoru  
**Sent:** Friday, May 8, 2020 2:24 PM  
**To:** Morimoto, Kaoru  
**Subject:** FW: Nevada National Security Site Request for Extension to Letter Response

-----Original Message-----

From: Morimoto, Kaoru  
Sent: Wednesday, May 6, 2020 11:32 AM  
To: Wade, Scott <scott.wade@nnsa.doe.gov>  
Cc: Lin, Sharon <Lin.Sharon@epa.gov>; Bowman, David <david.bowman@nnsa.doe.gov>; Wedl, Brian <brian.wedl@nnsa.doe.gov>; Tomlinson, Laura M. <laura.tomlinson@nnsa.doe.gov>; Krauss, Mark (CONTR) <kraussmj@nv.doe.gov>; Belka, Troy (CONTR) <belkats@nv.doe.gov>; Gladden, Kathryn <kathryn.gladden@nnsa.doe.gov>; Morgan, Darwin J <darwin.morgan@nnsa.doe.gov>; Mellor, Barry <barry.mellor@nnsa.doe.gov>; Julian, Jason <jason.julian@nnsa.doe.gov>; Boehlecke, Robert (EMCBC) <robert.boehlecke@emcbc.doe.gov>; Donnelly, James P <james.donnelly@npo.doe.gov>  
Subject: RE: Nevada National Security Site Request for Extension to Letter Response

Scott,

Given the current national health crisis, your request for an extension to submit a response is granted. The revised response due date is now Monday, July 13.

Thanks,  
Kaoru

Kaoru Morimoto, Manager  
Hazardous Waste and Chemical Section (ENF-2-2) Enforcement and Compliance Assurance Division U.S. Environmental Protection Agency, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105  
(415) 972-3306

-----Original Message-----

From: Wade, Scott  
Sent: Friday, May 01, 2020 2:49 PM  
To: Morimoto, Kaoru <Morimoto.Kaoru@epa.gov>  
Cc: Lin, Sharon <Lin.Sharon@epa.gov>; Belka, Troy (CONTR) <belkats@nv.doe.gov>; Ling, Michael (CONTR) <lingmw@nv.doe.gov>; Krauss, Mark (CONTR) <kraussmj@nv.doe.gov>; Radack, Phyllis (CONTR) <radackpm@nv.doe.gov>; Christine Andres <CANDRES@ndep.nv.gov>; Mike Richardson <mrichard@ndep.nv.gov>; Boehlecke, Robert (EMCBC) <Robert.boehlecke@emcbc.doe.gov>; Wilborn, Bill (EMCBC) <bill.wilborn@emcbc.doe.gov>; Bowman, David <David.Bowman@nnsa.doe.gov>; Clifton, Brian <Brian.Clifton@nnsa.doe.gov>; Gladden, Kathryn <Kathryn.Gladden@nnsa.doe.gov>; Huck, Betty <Betty.Huck@nnsa.doe.gov>; Tomlinson, Laura M. <Laura.Tomlinson@NNSA.Doe.Gov>; Wedl, Brian <Brian.Wedl@nnsa.doe.gov>; Pasulka, Matthew P (CONTR) <pasulkmp@nv.doe.gov>; Donnelly, James P <James.Donnelly@npo.doe.gov>; CorrespondenceManagement <corresmgmt@nv.doe.gov>; emrecords@emcbc.doe.gov; Hitson, Mary <mary.hitson@npo.doe.gov>; Lawrence, Steven <Steven.Lawrence@NNSA.Doe.Gov>; Mellor, Barry <Barry.Mellor@nnsa.doe.gov>; Julian, Jason <Jason.Julian@NNSA.Doe.Gov>; Gibson, Coleen C. <Coleen.Gibson@NNSA.DOE.Gov>

Subject: Nevada National Security Site Request for Extension to Letter Response

Kaoru,

Attached please find our letter requesting an extension to the response date identified in your letter of April 10, 2013. Please let me know if you have questions on our extension request. As also indicated in the letter, we'd like to schedule a telecom discussion with you and other U.S. Environmental Protection Agency management and technical personnel to discuss the identified issues. This proposed telecom discussion will help inform us as we gather information to provide in our response. Please let me know if there is a preferable date and time for this discussion.

Let me know if you have any questions on either the extension request or on the telecom discussion. It is easiest to get in touch with me either through email or on my government cell phone (702) 241-2594.

Scott Wade  
NNSA Nevada Field Office





**Department of Energy**  
National Nuclear Security Administration  
Nevada Field Office  
P.O. Box 98518  
Las Vegas, NV 89193-8518



See Digital Signature

Kaoru Morimoto  
Hazardous Waste and  
Chemical Section  
U.S. Environmental Protection  
Agency, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**NATIONAL NUCLEAR SECURITY ADMINISTRATION NEVADA FIELD OFFICE  
(NNSA/NFO) RESPONSE - U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)  
COMPLIANCE EVALUATION INSPECTION (CEI) AND NOTICE OF VIOLATION**

On April 13, 2020, the NNSA/NFO received a CEI report and Notice of Violation from the USEPA that documents the USEPA observations from the August 2019 Resource Conservation and Recovery Act (RCRA) compliance inspection conducted at the Nevada National Security Site (NNSS). In the letter, the USEPA requested that NNSA/NFO submit a response within 30 days of receipt of the report. In light of the current situation from the COVID-19 virus, NNSA/NFO requests a 60-day extension to assemble relevant records and responses to the USEPA CEI and Notice of Violation. As such, the revised due date for response is proposed as July 13, 2020.

To assure that we have a full understanding of the issues and basis for the regulator determinations with the report, NNSA/NFO requests a telecom meeting with the appropriate technical and management personnel from EPA Region IX.

If you have questions including coordinating the proposed meeting, please contact me at (702) 295-4111 (w), or (702) 241-2594 (c), or at [Scott.Wade@nnsa.doe.gov](mailto:Scott.Wade@nnsa.doe.gov).

**Scott A.  
Wade**  
Scott Wade  
Senior Advisor  
For Environmental Management

Digitally signed by  
Scott A. Wade  
Date: 2020.05.01  
14:22:24 -07'00'

cc:  
S. Lin, USEPA  
S. Alderson, MSTs  
T. Belka, MSTs  
M. Ling, MSTs

M. Krauss, MSTS  
P. Radack, MSTS  
C. Andres, NDEP  
M. Richardson, NDEP  
R. Boehlecke, EM NV  
B. Wilborn, EM NV  
D. Bowman, NFO  
B. Clifton, NFO  
K. Gladden, NFO  
B. Huck, NFO  
L. Tomlinson, NFO  
S. Wade, NFO  
B. Wedl, NFO  
M. Hitson, NPO  
J. Donnelly, NPO  
MSTS Correspondence Management  
EM Records

ADM 16.1.5.A